

REMARKS

Claims 1 and 3 are amended. Claims 1 and 3-8 remain in the Application.

Reconsideration of the pending claims is respectfully requested in view of the above amendment and the following remarks.

I. Claims Rejected Under 35 U.S.C. § 103(a)

Claim 1 is rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,418,494 issued to Betti et al. ("Betti"). Applicants respectfully traverse the rejection.

To establish a *prima facie* case of obviousness, the relied upon references must teach or suggest every limitation of the claim such that the invention as a whole would have been obvious at the time the invention was made to one skilled in the art. Amended Claim 1 incorporates a portion of allowed Claim 3 to recite, among other elements:

"... wherein the voltage-current converter further comprises:
a first NMOS transistor connected between a power supply terminal and a first output terminal and driven by a first input voltage; and
a second NMOS transistor connected between the power supply terminal and a second output terminal and driven by a second input voltage."

Applicants submit that Betti does not teach or suggest at least these elements.

The Examiner relies on transistors (Q1, Q2) in FIG. 4 of Betti for disclosing the first and second NMOS transistors. However, transistors (Q1, Q2) are each connected between a current source (I1 or I2) and the emitters of transistors ((Q3, Q4) or (Q5, Q6)). Even for the sake of argument that the connecting point to the emitters of Q3-Q6 is characterized as an output terminal, there is nothing in Betti that teaches or suggests (Q1, Q2) being connected to a power supply. A current source is not a power supply. Under normal operating conditions, a power supply provides substantially constant voltage while a current source supplies substantially constant current. Under the conditions of a short circuit or an open circuit, a power supply and a current source exhibit opposite behaviors. A power supply provides near infinite energy to a short circuit and no energy to an open circuit; by contrast, a current source provides no energy to an open circuit and near infinite energy to a short circuit. Thus, current sources I1 and I2 cannot teach or suggest the claimed power supply. Thus, Betti does not teach or suggest each of the elements of amended Claim 1.

Accordingly, reconsideration and withdrawal of the obviousness rejection of Claim 1 are requested.

II. Allowable Subject Matter

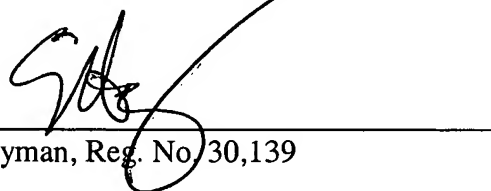
Applicants appreciate the Examiner's indication that Claims 3-8 would be allowable if rewritten in independent form. Applicants respectfully submit that the amendment to its base Claim 1 has obviated the need to rewrite these dependent claims. As Claim 1 is in condition for allowance, Claims 3-8 are allowable at least for the reasons mentioned in regard to Claim 1. Accordingly, reconsideration and withdrawal of the objection of Claims 3-8 are requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



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Eric S. Hyman, Reg. No. 30,139

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, California 90025
Telephone (310) 207-3800
Facsimile (310) 820-5988

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Nedy Calderon
Nedy Calderon

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